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12 Attorneys for Defendants WELLPATH, LLC; WELLPATH MANAGEMENT, INC.; CRYSTAL  
13 COMER; TANYA ATKINSON and PAMELA JOHANSEN

14 **UNITED STATES DISTRICT COURT**

15 **EASTERN DISTRICT OF CALIFORNIA**

16 DARIO CERAGIOLI, deceased by and  
17 through ELIZABETH CERAGIOLI, as  
18 Successor in Interest, ELIZABETH  
19 CERAGIOLI in her personal capacity, MARY  
20 CERAGIOLI, ANTHONY CERAGIOLI, and  
21 JOSHUA CERAGIOLI,

22 Plaintiffs,

23 vs.

24 BUTTE COUNTY, a municipal corporation;  
25 Sheriff KORY L. HONEA; CASEY O'HERN;  
26 JOSEPH GEORGE; CRYSTAL COMER; TANYA  
27 ATKINSON; PAMELA JOHANSEN; and  
28 WELLPATH, LLC; WELLPATH  
MANAGEMENT, Inc.; and DOES 1 through 60,  
inclusive,

29 Defendants.

30 CASE NO. 2:23-cv-01113-TLN-DMC

31 **STIPULATION AND ORDER TO  
32 EXTEND DEADLINE FOR WELLPATH  
33 DEFENDANTS TO RESPOND TO FIRST  
34 AMENDED COMPLAINT**

35 Complaint Filed: June 12, 2023  
36 1<sup>st</sup> Am. Comp. Filed: June 12, 2024  
37 Trial Date: None Set

38 Plaintiffs DARIO CERAGIOLI, deceased by and through ELIZABETH CERAGIOLI, as  
39 Successor in Interest, ELIZABETH CERAGIOLI in her personal capacity, MARY CERAGIOLI,  
40 ANTHONY CERAGIOLI, and JOSHUA CERAGIOLI and Defendants WELLPATH, LLC,

1 WELLPATH MANAGEMENT, INC., CRYSTAL COMER, TANYA ATKINSON, and PAMELA  
2 JOHANSEN (“Wellpath Defendants”), by and through their undersigned counsel of record, and subject  
3 to the approval of the Court, stipulate as follows:

4 RECITALS

5 A. On June 12, 2024, Plaintiffs filed a First Amended Complaint (ECF 34).

6 B. The responsive pleading on behalf of the Wellpath Defendants to the First Amended  
7 Complaint is due on July 3, 2024.

8 C. The parties are meeting and conferring as to the potential filing of a Motion to Dismiss on  
9 behalf of Defendants WELLPATH, LLC and WELLPATH MANAGEMENT, INC. as to Counts 5 and  
10 9 of the First Amended Complaint. The parties hope to avoid further motion practice but require  
11 additional time to meet and confer on these issues.

12 D. This is the parties’ first stipulation to extend the time for the Wellpath Defendants to file a  
13 responsive pleading to the First Amended Complaint.

14 E. In light of the above, the parties stipulate that the responsive pleading on behalf of the  
15 Wellpath Defendants will be extended 30 days from the original deadline. The new deadline will be  
16 August 2, 2024.

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1 **STIPULATION**

2 Given the foregoing, the parties respectfully request that the Court approve the parties' stipulation  
3 that the deadline to file a responsive pleading on behalf of the Wellpath Defendants be extended 30 days  
4 to August 2, 2024.

5 Dated: July 1, 2024

**MEDICAL DEFENSE LAW GROUP**

6  
7 */s/ Paul A. Cardinale*

8 By: \_\_\_\_\_

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10 Paul A. Cardinale, Esq.  
11 Attorney for Defendants WELLPATH, LLC;  
12 WELLPATH MANAGEMENT, INC.; CRYSTAL  
13 COMER; TANYA ATKINSON and PAMELA  
14 JOHANSEN

15 Dated: July 1, 2024

**MITCHELL LEEDS, LLP**

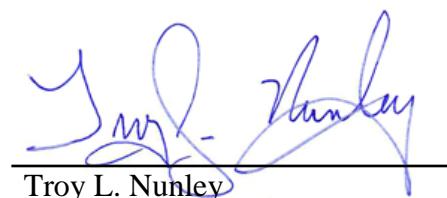
16 By: \_\_\_\_\_

17 Nathaniel M. Leeds, Esq.  
18 Jeffrey Mitchell, Esq.  
19 Attorney for Plaintiffs DARIO CERAGIOLI, deceased  
20 by and through ELIZABETH CERAGIOLI, as  
21 Successor in Interest, ELIZABETH CERAGIOLI in  
22 her personal capacity, MARY CERAGIOLI,  
23 ANTHONY CERAGIOLI, and JOSHUA CERAGIOLI

24 **ORDER**

25 PURSUANT TO STIPULATION, IT IS SO ORDERED that the deadline to file a responsive  
26 pleading on behalf of the Wellpath Defendants is extended until August 2, 2024.

27 Dated: July 2, 2024

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Troy L. Nunley  
United States District Judge